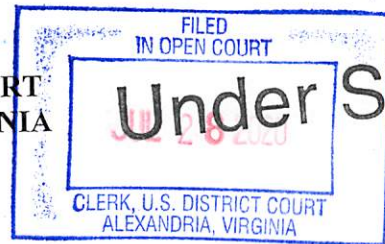


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

PATRICK CARL ACOSTA,
a/k/a: "Norse,"

JAMIE DEAN STROMER,

and JOSHUA J. PALMER

Defendants.

Criminal No. 1:20-CR-172

Count 1: 21 U.S.C. §§ 841(a)(1), 846
(Conspiracy to Distribute Anabolic
Steroids)

Count 2: 18 U.S.C. § 1956(h)
(Conspiracy to Commit Money Laundering)

Forfeiture: 21 U.S.C. § 853

INDICTMENT

July 2020 Term—at Alexandria, Virginia

COUNT ONE

(Conspiracy to Distribute Anabolic Steroids)

THE GRAND JURY CHARGES THAT:

Beginning at least in approximately 2014, and continuing up to and including July 2020, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants PATRICK CARL ACOSTA, JAMIE DEAN STROMER, and JOSHUA J. PALMER did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to unlawfully, knowingly, and intentionally distribute anabolic steroids, a Schedule III controlled substance.

(In violation of 21 U.S.C. §§ 841(a)(1) and 846.)

COUNT TWO
(Conspiracy to Commit Money Laundering)

Beginning at least in approximately 2014 and continuing up to and including July 2020, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants PATRICK CARL ACOSTA, JAMIE DEAN STROMER, and JOSHUA J. PALMER did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to unlawfully, knowingly, and intentionally conduct and attempt to conduct financial transactions affecting interstate and foreign commerce which involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances as set forth in Count One of the Indictment, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and/or the control of the proceeds of specified unlawful activity and that, while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

(In violation of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(h).)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS that there is probable cause that the property described below is subject to forfeiture.

Pursuant to Rule 32.2(a), the defendants are hereby notified that, if they are convicted of Count One, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violation and any property used, or intended to be used, to commit, or to facilitate such violation.

(In accordance with 21 U.S.C. § 853(a) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.)

A TRUE BILL

Pursuant to the E-Government Act,,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

G. Zachary Terwilliger
United States Attorney

By:


Philip Alito
Assistant United States Attorney

Digitally signed by PHILIP
ALITO
Date: 2020.07.27 16:29:28
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